

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FREE SPEECH COALITION, INC. et al.,)) Civil Action No. 2:09-4607
))
Plaintiffs,)) Judge Michael M. Baylson
))
v.)) STIPULATION TO STAY DISCOVERY
)) WITH RESPECT TO PLAINTIFFS'
THE HONORABLE ERIC H. HOLDER, JR.,)) FOURTH AMENDMENT CLAIMS
Attorney General,))
))
Defendant.))
))

The parties, through undersigned counsel, hereby agree and stipulate that all discovery obligations, including initial disclosure obligations, with respect to plaintiffs' Fourth Amendment claims shall be stayed pending this Court's ruling on defendant's Motion to Dismiss those claims. *See* ECF No. 92. Should the Court subsequently deny defendant's Motion to Dismiss in Part, the parties shall file a supplemental proposed discovery schedule, setting forth separate proposed discovery deadlines with respect to plaintiffs' Fourth Amendment claims, within thirty days of the Court's Order.

August 28, 2012

Respectfully submitted,

/s/
J. Michael Murray
jmmurray@bgmdlaw.com
Lorraine R. Baumgardner
lbaumgardner@bgmdlaw.com
Berkman, Gordon, Murray & DeVan
55 Public Square Ste. 2200
Cleveland, Ohio 44113
Tel. (216) 781-5245 / Fax (216) 781-8207
Kevin E. Raphael
KER@Pietragallo.com
J. Peter Shindel, Jr.

JPS@Pietragallo.com
Pietragallo Gordon Alfano Bosick
& Raspanti, LLP
1818 Market Street, Suite 3402
Philadelphia, Pennsylvania 19103
Tel. (215) 320-6200/ Fax (215) 981-0082
Attorneys for Plaintiffs

STUART F. DELERY
Acting Assistant Attorney General
ZANE DAVID MEMEGER
United States Attorney
VINCENT M. GARVEY
Deputy Branch Director

/s/ Kathryn L. Wyer
KATHRYN L. WYER
U.S. Department of Justice, Civil Division
20 Massachusetts Avenue, N.W.
Washington, DC 20530
Tel. (202) 616-8475 / Fax (202) 616-8470
kathryn.wyer@usdoj.gov
Attorneys for Defendant

APPROVED BY:

HON. MICHAEL M. BAYLSON

Certification Pursuant to Local Rule 7.1(b)

The foregoing Stipulation to Stay Discovery With Respect to Plaintiffs' Fourth Amendment Claims has been agreed to by all parties.

/s/ Kathryn L. Wyer
KATHRYN L. WYER

CERTIFICATE OF SERVICE

Pursuant to Local Rule 5.1.2(8)(b), I hereby certify that the foregoing document has been filed electronically and is available for viewing and downloading from the ECF system. I further certify that the foregoing document was served via ECF on counsel of record for plaintiffs in the above-captioned case.

Dated: August 28, 2012

/s/
Kathryn L. Wyer